UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA	:	
v.	:	**Case No. 1:24-mj-380**
DANIEL DUSTIN DENEUI	:	
Defendant.	:	

MOTION FOR PERMISSION TO TRAVEL TO PRESIDENTIAL INAUGURATION

COMES NOW the defendant, Daniel Dustin Deneui, by and through counsel, Jeffrey Zimmerman, and respectfully requests that the Court grant him permission to travel to Washington, DC on January 18-21 to attend the inauguration ceremony of President Trump and related events.

Mr. Deneui was arrested on December 18, 2024, based on a complaint alleging violations of 18 U.S.C. § 111 (a)(l); 18 U.S.C. § 231(a)(3); 18 U.S.C. §§ 1361 and 2; 18 U.S.C. § 1752(a)(l) and (b)(l)(A); 18 U.S.C. § 1 752(a)(2) & (b)(l)(A); 18 U.S.C. § 1 752(a)(4); 40 U.S.C. § 5104(e)(2)(D); and 40 U.S.C. § 5104(e)(2)(F).

Mr. Deneui has been released on his own recognizance, subject to Pretrial Services Supervision. The Pretrial Services Report for this Court states that his "Risk Level" is "Low." It specifically notes that Mr. Deneui has no prior convictions and no history of supervision noncompliance. He has been in full compliance with conditions in DC and in his home jurisdiction of the Northern District of Texas (Fort Worth). He appeared earlier today for his Initial Appearance by Zoom. At that hearing, Assistant United States Attorney Megan McFadden, stated that the government "would defer to the Court" regarding this request.

The Court directed undersigned counsel to the Court's Minute Order in *United States v. Young,* No. 23-mj-136-GMH (D.D.C Jan. 10, 2025). The Order reflects that inauguration travel requests have generally been granted, with two exceptions. In *United States v. Taylor,* 21-cr-392 (D.D.C.), the defendant had been convicted of conspiracy to obstruct an official proceeding, in violation of 18 U.S.C. §1512(k). In denying his request to travel to the inauguration, Judge Lamberth noted that he had been convicted of "unusually grave conduct." *See Memorandum Order,* 21-cr-392, ECF 522 at 3 (D.D.C. Jan 3, 2025). This included providing a backpack full of weapons to a co-defendant and actively encouraging others to bring weapons to the Capitol. *Id.* Mr. Taylor himself brought a knife to the Capitol and carried a backpack containing a hatchet and a stun baton. *Id.* He repeatedly threatened the police. *Id.*

By contrast to Mr. Taylor, Mr. Deneui is entitled to the presumption of innocence and he maintains his innocence of these charges. In addition, the allegations against him do not rise to the level of conduct for which Mr. Taylor had been convicted.

In *United States v. Tatum*, 24-cr-291 (D.D.C.), the defendant "admitted to participating in the events at the Capitol on January 6" and "there is video evidence demonstrating some horrific aspects of his conduct." *See Memorandum Order,* 24-cr-291, ECF 30 at 3 (D.D.C. Jan 4, 2025). In denying the travel request, Judge Bates noted that Mr. Tatum was facing numerous additional pending state cases involving disorderly conduct, cyberstalking, and being a fugitive. *Id.* at 4-5. Tatum was also arrested while on pretrial supervision in this Court for driving under the influence of marijuana. *Id.* at 5.

Mr. Deneui has no prior criminal record, he has no pending charges aside from the instant case, he has been completely compliant with his conditions of release, and he is entitled to a presumption of innocence. He has been deemed a "Low Risk" by Pretrial Services.

Mr. Deneui respectfully requests that this Court grant him permission to travel to DC on January 18-21 to attend President Trump's Inauguration and related events. To the extent that this request can be deemed a motion to modify his conditions of release, we so move. *See Order Setting Condition of Release,* ECF 10 at 3 ¶ 7(s) ("Stay away from D.C." except for matters relating to this case).

Respectfully Submitted,

DANIEL DUSTIN DENEUI
By Counsel

___/s/_____
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CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of January 2025, a true and accurate copy of the foregoing was electronically filed and served via the Court's CM/ECF system to all counsel of record.

_____/s/_____
JEFFREY D. ZIMMERMAN